



**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND  
506 ROEDER CIRCLE  
FORT SNELLING, MINNESOTA 55111-4009



REPLY TO  
ATTENTION OF

Deputy Chief of Staff, Engineering

US EPA RECORDS CENTER REGION 5



431784

Dear Ms. Ripley:

Enclosed are the environmental assessment and the APA checklist. I have also included the example correspondence letters between the Army Reserve and the Michigan Department of Environmental Quality regarding the one-time large quantity generator status exceedence.

Please feel free to contact me at (612) 713-3821 if you have any questions regarding the information that I have provided.

Sincerely,

Kurt F. Zacharias  
Environmental Protection Specialist

Enclosures

For Part 2, if information is not available to make a “yes” or “no” response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

YES	NO
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1.	Does the site have a release or a potential to release?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2.	Does the site have uncontained sources containing CERCLA eligible substances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Does the site have documented on-site, adjacent, or nearby targets?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

YES	NO
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If the answers to questions 1, 2, and 3 above were all “yes” then answer the questions below before proceeding to Part 3.		YES	NO
4.	Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?	<input type="checkbox"/>	<input type="checkbox"/>
7.	Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site?	<input type="checkbox"/>	<input type="checkbox"/>

**Notes:**

**EXHIBIT 1**  
**SITE ASSESSMENT DECISION GUIDELINES FOR A SITE**

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgement when evaluating a site. Your judgement may be different from the general recommendations for a site given below.

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI
1. There are no releases or potential to release.		Yes	No	No	No
2. No uncontained sources with CERCLA-eligible substances are present on site.		Yes	No	No	No
3. There are no on-site, adjacent, or nearby targets.		Yes	No	No	No
4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.	Option 1: APA ⇔ SI	Yes	No	No	Yes
	Option 2: PA/SI	No	No	Yes	NA
5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.	Option 1: APA ⇔ SI	Yes	No	No	Yes
	Option 2: PA/SI	No	No	Yes	NA
6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site.		No	Yes	No	No
7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.		No	Yes	No	No

**Part 3 - EPA Site Assessment Decision**

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was "no," then an APA may be performed and the "NFRAP" box below should be checked. Additionally, if the answer to question 4 in Part 2 is "yes," then you have two options (as indicated in Exhibit 1): Option 1 -- conduct an APA and check the "Lower Priority SI" or "Higher Priority SI" box below; or Option 2 -- proceed with a combined PA/SI assessment.

**Check the box that applies based on the conclusions of the APA:**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> NFRAP         | <input type="checkbox"/> Refer to Removal Program - further site assessment needed |
| <input type="checkbox"/> Higher Priority SI       | <input type="checkbox"/> Refer to Removal Program - NFRAP                          |
| <input type="checkbox"/> Lower Priority SI        | <input type="checkbox"/> Site is being addressed as part of another CERCLIS site   |
| <input type="checkbox"/> Defer to RCRA Subtitle C | <input type="checkbox"/> Other: _____  |
| <input type="checkbox"/> Defer to NRC             |  |

Regional EPA Reviewer:

Laura G. Ripley  
Print Name/Signature

7/10/2001  
Date



B-1

**DEPARTMENT OF THE ARMY**  
**HEADQUARTERS, 88TH REGIONAL SUPPORT COMMAND**  
**506 ROEDER CIRCLE**  
**FORT SNELLING, MINNESOTA 55111-4009**

REPLY TO  
ATTENTION OF  
AFRC-CMN-EN

18 May 2001


MDEQ-HWD  
HAZARDOUS WASTE NOTIFICATION  
HANNAH BUILDING, 1<sup>ST</sup> FLOOR  
ATTN: ELAINE SELLECK  
P.O. BOX 30241  
LANSING, MICHIGAN 48909

Subject: Indoor Firing Range Closures for State of Michigan

1. This is to inform you of a one time cleanup action for the permanent closure of the Army Reserve indoor firing ranges. The following information is submitted for action taken as a one time clean-up for permanent closure of the indoor firing ranges at the following Army Reserve Centers in Michigan;

Facility Name and City	EPA ID#	Type and Quantity of HW Generated	Date Certified
Robert Poxon USARC, Southfield	MI6 210 490 458	660 gals rinse water containing lead (D008)	1/30/01 (rinse water) 3/27/01 (rinse - reclean)
W. Birbari USARC, Fraser	MI0 000 116 053	210 gals rinse water containing lead (D008) and approx. 28,900 lbs sand containing lead (D008)	1/30/01 (rinse water) 2/13/01 (sand)
George Custer USARC, Livonia	MI8 210 090 199	205 gals rinse water containing lead (D008) and approx. 17,980 lbs sand containing lead (D008)	1/30/01 (rinse water) 1/23/01 (sand)

2. We apologize for the inconvenience that this may have caused and wish to work with you diligently to continue a good neighbor relationship and promote the welfare of the MDEQ environmental compliance mission. With the deactivation of these ranges, (as well as a waste stream), and upon completion of your office administrative requirements, I would ask that the Generator Status of these facilities be changed back to an SQG. The hazardous waste generated will be reported on the Biennial Report due by 1 March 2002.
3. Thank you for your assistance, once this action is complete and if there are any further questions regarding this matter, please notify myself at commercial 612-713-3051.

  
David Moore  
Environmental Protection Specialists  
88<sup>th</sup> Regional Support Command.

**"THE RIGHT PLACE TO SOLDIER"**

MAY 24 2001

WASTE MANAGEMENT DIVISION



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

*"Better Service for a Better Environment"*

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: [www.deq.state.mi.us](http://www.deq.state.mi.us)

RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION  
PO BOX 30241  
LANSING MI 48909-7741

May 25, 2001

David Moore, Environmental Protection Specialist  
Department of the Army  
88th Regional Support Command  
506 Roeder Circle  
Fort Snelling, MN 55111-4009

Dear Mr. Moore:

SUBJECT: Notification of Regulated Waste Activity  
Identification Number **MI6 210 490 458**

The Michigan Department of Environmental Quality (MDEQ) has received a Notification of Regulated Waste Activity dated May 18, 2001, which you submitted pursuant to Section 3010 of the federal Resource Conservation and Recovery Act, 42 U.S.C. 6930 and Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 32.111-01 et seq. for **Robert Poxon USARC** located at **Southfield, Michigan**.

This subsequent submittal updated the following information:

One time clean up of indoor firing range requiring change of generator status to LQG. **Return to SQG status following cleanup.**

If you have any questions, please contact me at 517-335-5035.

Sincerely,

Elaine Sellek  
Notification Project Coordinator  
Waste Management Division

cc: Southeast Michigan District, WMD, MDEQ  
File





"Zacharias, Kurt F Mr  
(88ENGR)"  
<Kurt.Zacharias@usa  
rc-emh2.army.mil>

To: LAURA RIPLEY/R5/USEPA/US@EPA  
cc:  
Subject: Youngstown, OH U.S. Army Reserve Center: APA checklist...

07/10/01 11:19 AM

Laura, attached is the completed APA checklist.

I have also included the inquiry by the Army Reserve and the State's (Michigan DEQ) response letter regarding the LQG to SQG status. The second paragraph of the Army Reserve letter to the State requests that the LQG status be change to SQG. There is no one-time LQG exemption per se in the regs, but you can see here in the Michigan DEQ's letter that we have recieved a one-time exemption.

I will attach these documents to the environmental assessment report that I mail to you.

Let me know if you have any questions with what I have sent you. Thank you.

<<LQG exemption letter.pdf>> <<Youngstown OH APA checklist.pdf>>

Kurt Zacharias  
88th Regional Support Command  
506 Roeder Circle  
Fort Snelling, MN 55111  
Phone: 612-713-3821  
Fax: 612-713-3516  
Title: Environmental Protection Specialist



LQG exemption letter Youngstown OH APA checkli